

EXHIBIT C-1

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

JESSE J. MOLYNEUX (IA) and JOHN)
STELLMACH (WI), Individually and on)
Behalf of All Others Similarly Situated,) CIVIL NO. 4:10-CV-00588-JAJ-TJS
Plaintiffs,)
v.)
SECURITAS SECURITY SERVICES, USA)
INC.,)
Defendant.)
)
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)
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DECLARATION OF SANDRA CUNEO, ESO.

I, Sandra Cuneo, an attorney in the above-captioned matter, hereby state under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am an attorney at the law firm Cuneo, Gilbert & LaDuca, LLP (hereinafter "CGL") and a member of the Plaintiffs' Counsel Group in this lawsuit.
2. I submit this declaration to: i) apprise the Court of the total number of attorney hours CGL expended on this litigation; ii) apprise the Court of CGL's "out-of-pocket" litigation expenses in this matter; iii) provide the Court with justification for calculating my firm's lodestar; and iv) permit the Court to conduct a "lodestar crosscheck" of the attorney's fee sought from the common settlement fund.
3. CGL's professional biography is attached as Exhibit A.
4. According to CGL contemporaneous time records, CGL has invested 106.65 hours on this litigation from December 9, 2010 to October 15, 2012. My firm's total lodestar amount in this case is \$51,277.50, as shown below:

NAME	RANK	HOURLY RATE	CURRENT HOURS	PREVIOUS HOURS	TOTAL HOURS	TOTAL LODESTAR
Jon A. Tostrud	Of Counsel	\$600		50.90	50.90	\$30,540.00
Anthony Carter	Associate	\$375		54.50	54.50	\$20,437.50
Gabe Stutman	Paralegal	\$200		1.25	1.25	\$250.00
TOTAL			0.00	106.65	106.65	\$51,277.50

CGL contemporaneous time records supporting this total are available for the Court's inspection upon request.

5. The current hourly rates described above represent usual and customary rates, based on the skill, experience, reputation, and the fees CGL lawyers have recently received in other matters. To my knowledge, this rate is in line with, if not below, the prevailing rate charged by lawyers of comparable skill, experience and reputation in my region who handle similar types of cases.

6. CGL's business records establish that, from December 9, 2010 to October 15, 2012, the firm's "out-of-pocket" expenses in this litigation are \$2,154.56. CGL incurred these following expenses, which are typical of the types of expenses a paying client would expect to be charged in litigation of this nature, in the course of my representation:

EXPENSES

DISBURSEMENT	TOTAL
Copying	\$16.54
Court Fees	\$75.00
Posting/Express Mail/Messenger	\$345.79
Publications	\$76.36
Telephone/Facsimile/Internet	\$54.47

Travel/Meals	\$1,586.40
TOTAL	\$2,154.56

My firm's business records supporting these expenditures are available for the Court's inspection upon request.

I, Sandra Cuneo, hereby declare, subject to penalty of perjury, that the above facts are true and correct to the best of my knowledge, information, and belief.

Date: October 11, 2012

Sandra Cuneo
Sandra Cuneo, Esq.